



## **Economic Impact Analysis Virginia Department of Planning and Budget**

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### **18 VAC 150-20 – Regulations Governing the Practice of Veterinary Medicine Department of Health Professions (DHP), Board of Veterinary Medicine**

April 30, 2002

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The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 9-6.14:7.1.G of the Administrative Process Act and Executive Order Number 25 (98). Section 9-6.14:7.1.G requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. The analysis presented below represents DPB's best estimate of these economic impacts.

### **Summary of the Proposed Regulation**

Following a periodic review of this regulation, the Board of Veterinary Medicine proposes to amend the *Regulations Governing the Practice of Veterinary Medicine* to address issues that have been confusing to licensees and members of the public, including delegation of veterinary tasks, veterinary facility requirements, duties of the veterinarian-in-charge, and the licensure renewal date. The proposed changes include the following:

- ?? The definition of surgery is revised to specify that dental extractions and closures do not constitute surgery and may therefore be performed by a veterinary technician;
- ?? A provision is added to the regulation to set the parameters for tasks that may be delegated to unlicensed veterinary assistants. This area is currently only addressed by guidance documents issued by the Board of Veterinary Medicine;
- ?? The term "animal facility" is replaced throughout the regulation with the term "veterinary establishment" to clarify the entities that are required to register with the Board;
- ?? The requirement for the biennial drug inventory is revised to comply with updated Drug Enforcement Administration rules;

- ?? Record-keeping requirements are relaxed to permit one record per group of animals in the same litter up to the age of four months. Currently, separate records must be kept on each animal;
- ?? The rules concerning facility requirements are amended to 1) specify that there must be a door, rather than a partition or small opening, to the surgery room, 2) remove antiquated and nonessential equipment from the list of required equipment, and 3) specify that a small animal practice may be conducted in a mobile, as well as a stationary, establishment;
- ?? The provisions addressing the duties and responsibilities of the veterinarian in charge (VIC) are amended to 1) clarify responsibilities of the VIC when leaving a practice or no longer serving in that role, and 2) specify that a veterinarian must regularly (at least monthly) be on site and provide routine oversight of the practice at the establishment for which he is named VIC. The existing regulations require the VIC to practice on the premises full-time; and
- ?? The licensure renewal date is changed from March 1 to January 1 or each year.

## **Estimated Economic Impact**

The majority of the proposed changes are clarifications of current practices and do not represent any change in the Board of Veterinary Medicine's implementation of these regulations. Although these clarifications may make the regulation easier to understand and more useful for licensees, they are not likely to have any economic effects. Other proposed changes, such as permitting a joint record for animals in the same litter up to four months and removing nonessential items from the list of required equipment, are less stringent than the current requirements. Since these changes are not expected to reduce the quality of veterinary services provided, the reduction in regulatory burden may provide some economic benefit.

The amendment to change the renewal cycle to a calendar year is intended to provide a logical time for expiration of a license rather than an arbitrary date of March 1<sup>st</sup>. The board believes that renewal compliance may improve and late fees may be avoided. The change in the renewal schedule should not result in any additional cost, as the board plans to prorate the fee for during the one time transition from March to January.

The board also proposes to set into this regulation the parameters for delegation of duties to a veterinary technician or unlicensed veterinary personnel. Those tasks that may be delegated are those that do not require independent judgment and discretion; they are tasks that may be taught on the job and do not require a formal education. According to the board, patients are

protected by requirements for the veterinarian to remain responsible for any tasks delegated to an unlicensed person. By delegating appropriate tasks, veterinarians may be able to spend more time seeing patients and making diagnoses. Some consumers of veterinary services are critical of an expansion of the duties for technicians and assistants. In testimony before the Board, many expressed their concern about a diminution in the quality of care, but others, including veterinarians testified that the delegation of tasks to trained assistants was no different from the practice of human medicine. Since the guidelines for delegation of duties in the proposed regulation mirror the guidance documents issued by the Board of Veterinary Medicine over the past several years, this proposed change is unlikely to have any significant economic impact aside from providing a regulatory basis for this policy.

### **Businesses and Entities Affected**

There are currently 2,924 veterinarians, 792 veterinary technicians, and 800 veterinary facilities licensed by the Board of Veterinary Medicine in Virginia.

### **Localities Particularly Affected**

The proposed changes will not affect any particular localities as they apply statewide.

### **Projected Impact on Employment**

The proposed changes are not expected to have any significant impact on employment in Virginia.

### **Effects on the Use and Value of Private Property**

The proposed changes are not expected to have any significant effects on the use and value of private property in Virginia.